

Exhibit 4

16N4TERC

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

-----x

3 IN RE: TERRORIST ATTACKS
4 ON SEPTEMBER 11, 2001

03MDL1570 (GBD) (FM)

-----x

5
6 June 23, 2011
11:35 a.m.

7 Before:

8 HON. FRANK MAAS

9 Magistrate Judge

10 APPEARANCES

11 ANDERSON KILL & OLICK

Attorneys for O'Neill Plaintiffs and PECs

12 JERRY S. GOLDMAN

13 COZEN O'CONNOR

Attorneys for Federal Insurance Plaintiffs and PECs

14 SEAN P. CARTER

J. SCOTT TARBUTTON

15 MOTLEY RICE

Attorneys for Burnett Plaintiffs and PECs

16 ROBERT T. HAEFELE

17 CLIFFORD CHANCE

Attorneys for Defendant Dubai Islamic Bank

18 BY: RONI BERGOFFEN (via telephone)

19 McMAHON & ASSOCIATES

Attorneys for Defendants IIRO, MWL and Wa'el Jelaidan

20 BY: MARTIN McMAHON (via telephone)

21 STEVEN BARENTZEN (via telephone)

Attorney for Defendant Jamal Barzinji

16N4TERC

1 there is 636(c) language in the stipulation.

2 I guess that brings us, Mr. McMahon, to the issues
3 raised in the letter which I know you take the view are not yet
4 ripe related to IIRO and the Muslim World League. Putting
5 aside the question of ripeness as to some of the detail, one
6 fairly simple directive was that 8 categories of documents were
7 to be produced within 30 days. I take it the plaintiffs take
8 the view that that didn't happen.

9 I know at one of the last two conferences, I think it
10 was the April 26 one, I said we are really at the stage where
11 you need to sit down with your clients in Saudi Arabia and hold
12 their hands while they go through those 8 categories. I guess
13 I am curious whether you have been to the kingdom since that
14 session.

15 MR. McMAHON: Well, your Honor, just to bring you up
16 to speed, I received a very antagonistic email from Sean Carter
17 concerning his level of frustration.

18 THE COURT: More antagonistic than his letter of June
19 16; I am just trying to get the scale.

20 MR. McMAHON: Well, your Honor, I replied, because I
21 am somewhat older, in a very conciliatory manner and said,
22 Sean, I am equally frustrated. I don't read Arabic. I
23 wouldn't have sent you four indexes, two of which were
24 duplicative, had I known about it. I don't understand the
25 erosive indexes because they are in Arabic. So if you are